

Joseph & Norinsberg LLC

Fighting for Employee Justice



**Queens Office**

69-06 Grand Avenue, 3rd Floor  
Maspeth, New York 11378

**Manhattan Office**

110 East 59th Street, Suite 2300  
New York, New York 10022

**Newark Office**

One Gateway Center, Suite 2600  
Newark, New Jersey 07102

**Philadelphia Office**

1515 Market Street, Suite 1200  
Philadelphia, Pennsylvania 19102

**Boston Office**

225 Franklin Street, 26th Floor  
Boston, Massachusetts 02110

**Orlando Office**

300 N. New York Ave, Suite 832  
Winter Park, Florida 32790

**Jon L. Norinsberg, Esq.**  
[jon@norinsberglaw.com](mailto:jon@norinsberglaw.com)

March 6, 2024

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**VIA ECF**

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

**MEMORANDUM ENDORSED**

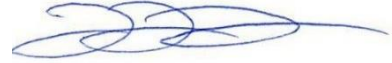
**Re: Competello v. Meaningful Beauty, LLC**  
**1:24-cv-00745 (GHW)**

Dear Judge Woods:

We represent Plaintiff Susan Competello (“Plaintiff”) in the above referenced ADA action against Defendant, Meaningful Beauty, LLC (“Defendant”). We write now to respectfully request a brief adjournment, from March 6, 2024, until March 20, 2024, to Defendant’s deadline to file a responsive pleading in this matter. The reason for this application is that counsel for Defendant Meaningful Beauty, LLC, Matt Orr, Esq., reached out to our firm today and expressed a willingness to engage in settlement discussions to potentially resolve this matter. Based on Mr. Orr’s overture, we believe that it would be in the best interest of all sides if the Court were to allow the parties a brief opportunity to engage in good faith settlement discussions.

In light of the foregoing, Plaintiff respectfully requests an extension of time, from March 6, 2024, to March 20, 2024, to seek a default judgment under Rule 55 of the Federal Rules of Civil Procedure.

We thank the Court for its consideration of this request.




Sincerely,  
Jon L. Norinsberg, Esq.

c.c. Matt Orr, Esq.  
[matt@amintalati.com](mailto:matt@amintalati.com)

Application granted in part and denied in part. The Court will not extend Defendant's deadline to answer or otherwise respond to the complaint until Defendant's counsel has filed a notice of appearance and made the request to extend the deadline. Plaintiff's application for an extension of time to seek a default judgment under FRCP 55 is granted. The deadline for Plaintiff to seek a default judgment under FRCP 55 is extended to March 20, 2024. The Court does not expect to take action on the case *sua sponte* before March 20, 2024. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 9.

SO ORDERED.

Dated: March 7, 2024  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge